

# COMM|PARTNERS<sup>™</sup> CONNECT

March 2, 2009

Via ECFS

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW, Suite TW-A325  
Washington, DC 20554

Re: Annual 47 C.F.R. S: 64.2009(e) CPNI Certification; EB Docket 06-36  
Annual 64.2009(e) CPNI Certification for 2008  
Date filed: March 2, 2009  
Name of company covered by this certification: CommPartners Holding  
Corporation and affiliates  
Form 499 Filer ID: 825445  
Name of signatory: Greg Roeper  
Title of signatory: President

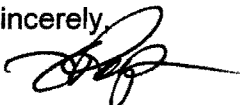
Dear Ms. Dortch:

I, Gregory Roeper, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules located at 47 C.F.R. §64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules. CommPartners Holding and its affiliates are strictly providers of voice over Internet protocol ("VoIP") services, and as such, have not been required to file annual CPNI certifications until last year.

If any further information is required, please contact me or our regulatory counsel Kristopher Twomey at 202 250-3413 or by email at kris@lokt.net.

Sincerely,



Gregory Roeper  
President

cc: Kristopher Twomey

## **CPNI Compliance Statement and Operating Procedures of CommPartners Holding Corporation and its Affiliates**

Pursuant to the requirements contained in *Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information; IP-Enabled Services*, CC Docket No. 96-115; WC Docket No. 04-36, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 6927 (2007) ("EPIC CPNI Order"),<sup>1</sup> Gregory Roeper, CommPartners Holding Corporation and affiliated entities makes the following statement:

Company has established policies and procedures to comply with the Federal Communications Commission's (FCC) rules regarding the use, disclosure, and access to section 64.2001 et seq. of the Commission's rules, 47 C.F.R. § 64.2001 et seq. These procedures ensure that Company is compliant with the FCC's customer proprietary network information (CPNI) rules. The purpose of this statement is to summarize Company's policies and procedures designed to safeguard CPNI.

Company uses CPNI for the limited purposes of initiating, rendering, billing, and collecting for telecommunications services, and may use CPNI, if necessary, to protect its property rights. Company does not disclose CPNI or permit access to such CPNI to any third parties other than as necessary to provide service.

Company has established procedures to verify an incoming caller's identity. Company trains its personnel in both the use of CPNI, and protection of its confidentiality. These procedures are detailed in Company's CPNI Manual. Company also limits the number of employees that have access to customer information and call data.


Company has implemented measures to discover and to protect against unauthorized attempts to access CPNI. Company also has implemented procedures pursuant to which it can track breaches of CPNI, and given such an event will notify the United States Secret Service and the Federal Bureau of Investigation in accordance with the FCC's rules. Company will track customer complaints regarding CPNI, notify its customers in accordance with the FCC's rules and will maintain a record of notifications to the USSS, FBI, for the time period specified in the FCC's rules.

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<sup>1</sup> 47 C.F.R. S: 64.2009(e) states: "A telecommunications carrier must have an officer, as an agent of the carrier, sign and file with the Commission a compliance certificate on an annual basis. The officer must state in the certification that he or she has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certification explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart. In addition, the carrier must include an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI. This filing must be made annually with the Enforcement Bureau on or before March 1 in EB Docket No. 06-36, for data pertaining to the previous calendar year."

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI , and what steps companies are taking to protect CPNI.

Company annually submits a CPNI certification to the FCC from an officer with personal knowledge of the policies and procedures that it has implemented to safeguard CPNI.

  
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Signed

Gregory Roeper  
President